



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
230 SOUTH DEARBORN ST.  
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

JUN 05 1990

5HS-11

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

TOM HARGETT  
FRUEHAUF CORP.  
LIQUID AND BULK TANK DIVISION  
P.O. BOX 660  
FORT WAYNE, IN 46801

Re: Wayne Reclamation and Recycling ("Site")  
Columbia City, Indiana

Dear Sir or Madam:

The United States Environmental Protection Agency (U.S. EPA) has documented the release or threatened release of hazardous substances, pollutants and contaminants at the above referenced Site. A Remedial Investigation/Feasibility Study (RI/FS) of the Site has been completed. This action was undertaken pursuant to the Comprehensive Environmental Response, Compensation and Liability Act of 1980, 42 U.S.C. Section 9601 et seq., as amended by the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499 (CERCLA).

In accordance with the requirements of Section 104(b) of CERCLA, the Remedial Investigation (RI) Report describes findings on the nature and extent of contamination at the Site. The Feasibility Study (FS) Report considered alternatives necessary to address the conditions at the Site. Along with the FS Report, U.S. EPA issued a Proposed Plan for a thirty day public comment period which ended February 21, 1990. On March 30, 1990, the Regional Administrator issued a Record of Decision (ROD) selecting the remedial action which was originally proposed (See Attachment III) for the Site.

Unless the U.S. EPA determines that a potentially responsible party (PRP) will voluntarily undertake the remedial action necessary at the Site, U.S. EPA may, under Section 104 of CERCLA, undertake the remedial action itself and, under Section 107 of CERCLA, seek reimbursement from PRPs of all response costs incurred in connection with the action taken. Such costs may include, but are not limited to, expenditures for investigation, planning, response and enforcement activities.

Moreover, under Section 106 of CERCLA, U.S. EPA may order responsible parties to implement relief actions deemed necessary by U.S. EPA to protect the public health, welfare or environment from an imminent and substantial

endangerment because of an actual or threatened release of a hazardous substance from a facility.

Responsible parties under Section 107 of CERCLA include current owners and operators of the Site, former owners and operators of the Site at the time of disposal of hazardous substances, as well as persons who owned or possessed hazardous substances and arranged for disposal, treatment, or transportation of such hazardous substances, and persons who accepted hazardous substances for transportation for disposal or treatment to a facility selected by such transporter. U.S. EPA has information indicating that you are a PRP with respect to the Wayne Reclamation and Recycling site. The sources of this information are briefly summarized in Paragraph A of Attachment I to this letter. By this letter, U.S. EPA notifies you of your potential liability with regard to this matter and encourages you, as a potentially responsible party, to reimburse U.S. EPA for the costs incurred to date and to voluntarily perform or finance the response activities that U.S. EPA has determined or will determine are required at the Site.

In accordance with CERCLA and other authorities, U.S. EPA has already undertaken certain actions and incurred certain costs in response to conditions at the Site. These response actions are summarized in Paragraph B of Attachment I to this letter. The approximate cost to date of the response actions performed through U.S. EPA funding at the Site is set forth in Paragraph C of Attachment I. The Agency anticipates expending additional funds for response activities at the Site under the authority of CERCLA and other laws. In accordance with Section 107(a) of CERCLA, demand is hereby made for payment of the amount specified in Paragraph C of Attachment I plus any and all interest authorized to be recovered under Section 107(a) or under any other provision of law. Demand is also hereby made under these authorities for payment of interest on all future costs that U.S. EPA may incur in regard to the Site.

U.S. EPA is currently planning to conduct the following additional response activities at the Site:

- Design and implementation of the remedial action selected and approved by U.S. EPA for the Site; and
- Provision of any monitoring, operation and maintenance necessary at the Site after the remedial action is completed.

In addition, U.S. EPA may, pursuant to its authorities under CERCLA and other laws, decide that other clean-up activities are necessary to protect public health, welfare and the environment.

If you are already involved in discussions with state or local authorities, engaged in voluntary clean-up action or involved in a lawsuit regarding this Site, you should continue such activities as you see fit. This letter is not intended to advise you or direct you to restrict or discontinue any such activities; however, you are advised to inform U.S.

EPA of the status of those discussions or actions in a response to this letter and to provide a copy of this response to any other parties involved in those discussions or actions. Your response letter should be sent to:

Tinka G. Hyde, 5HS-11  
U.S. Environmental Protection Agency  
230 South Dearborn Street  
Chicago, Illinois 60604

Pursuant to Section 122(e)(1) of CERCLA, the U.S. EPA has determined that a period of negotiation may facilitate an agreement with you and other PRPs. Upon initiation of the negotiations moratorium period, you will have a maximum of 60 days to coordinate with any PRPs and to present to U.S. EPA a "good faith" proposal for implementing and conducting the remedial action recommended in the Proposed Plan. To assist the PRPs in negotiating with U.S. EPA concerning this matter, U.S. EPA is providing a list of all other PRPs to whom this notification is being sent and the names and addresses of the RI/FS PRP Steering Committee. This list is appended as Attachment II to this letter. It should be noted that inclusion on or exclusion from the list does not constitute a final determination by the Agency concerning the liability of any party for remediation of Site conditions or payment of past costs. Information regarding a ranking by volume and nature of substances contributed by each PRP, as contemplated by Section 122(e)(4)(A), has previously been provided to the steering committee.

In accordance with the requirements of Section 122(e)(2), during the 60 day calendar period, beginning June 28, 1990, the U.S. EPA will not commence remedial action at the Site. U.S. EPA may, however, commence any additional studies or investigations authorized under Section 104(b), including remedial design, during this negotiation period. If U.S. EPA receives from the PRPs within the 60 day calendar period a written "good faith offer" which demonstrates the PRP's qualifications and willingness to conduct and/or finance the remedial design and remedial action (RD/RA) consistent with U.S. EPA's Proposed Plan, U.S. EPA will extend its moratorium on commencement of the remedial action work an additional 60 calendar days. The Proposed Plan, which recommended the remedy that was chosen by the Regional Administrator in the ROD, is appended as Attachment III.

The purpose of the additional time is to allow the PRPs and the U.S. EPA a period of time to finalize the settlement. A "good faith offer" for RD/RA should include the following:

- a statement of the PRPs' willingness to conduct and/or finance the RD/RA which is generally consistent with U.S. EPA's Proposed Plan or which provides a sufficient basis for further negotiations in light of U.S. EPA's Proposed Plan;
- a detailed "statement of work" or "workplan" identifying how PRPs plan to proceed with the work;

- o a demonstration of the PRPs' technical capability to undertake the RD/RA. This should include a requirement that PRPs identify the firm they expect will conduct the work or that PRPs identify the process they will undertake to select a firm.;
- o a demonstration of the PRPs' capability to finance the RD/RA;
- o a statement of the PRPs' willingness to reimburse U.S. EPA for past response and oversight costs; and
- o the name, address, and phone number of the party or steering committee who will represent the PRPs in negotiations.

Except in extraordinary circumstances explained in a written request, no extension to this 60 day period will be granted by the U.S. EPA. If a "good faith" proposal is not received within 60 calendar days, the U.S. EPA, pursuant to section 122(e)(4), may proceed to undertake such further action as is authorized by law, including implementation of the remedial action utilizing public funds available to the Agency.

To further facilitate your and any other PRPs' ability to present a "good faith" proposal within the 60 day time limit, the Agency has set up a meeting to provide information that will assist the PRPs in that effort. Toward that end, a draft Consent Decree and Statement of Work (SOW) will be provided to those persons attending this meeting. The details for the meeting are as follows:

Thursday, June 28, 1990  
10:30 a.m.  
Fort Wayne, Indiana  
Holiday Inn, Grand Ballroom  
300 E. Washington Blvd.  
(219) 422-5511

Additionally, the draft Consent Decree was provided to the State of Indiana. These revisions will be forwarded to the PRPs as they become available. Please note that the draft consent decree and scope of work, though already partly tailored for the purpose of exploring settlement possibilities with you at this particular site, are subject to changes based on the current, ongoing review of these documents by the Department of Justice.

An Administrative Record containing documents that form the basis for the Agency's decision on the selection of the remedy is available for public inspection at U.S. EPA - Region V office in Chicago, Illinois or at the information repositories located at the Columbia City Hall and Peabody Library in Columbia City, Indiana.

If you need further information regarding this letter, you may contact

Tinka Hyde of the Remedial and Enforcement Response Branch at (312) 886-9296. If you have an attorney handling your legal matters, please direct his or her questions to Elizabeth Doyle of the Office of Regional Counsel, U.S. EPA, Region V, at (312) 886-7951.

By a copy of this letter, the U.S. EPA is notifying the State of Indiana and the Natural Resources Trustees, in accordance with Section 122(j) of CERCLA, of its intent to enter into negotiations concerning the implementation of remedial action at the Site, and is also encouraging them to consider participation in such negotiations.

If you have not already done so, the U.S. EPA strongly encourages you to take immediate steps to organize into a Committee to negotiate an agreement with U.S. EPA to undertake the remedial actions at the Site. We hope that you will give this matter your immediate attention.

Sincerely yours,



John Kelley, Acting Chief  
Remedial and Enforcement Response Branch

Enclosures

cc: Sheila Huff, DOI  
Doug Fisher, IDEM  
Tom Mariani, DOJ  
Patrick Ralsdon, IDNR  
Environmental Defense Section, DOJ  
Indiana Attorney General  
Dan Sparks, USFW

## ATTACHMENT I

A. U.S. EPA has evaluated a body of evidence in connection with its investigation of the Site, specifically, State of Indiana, SPC-17 Liquid Waste Removal Record - Hauler Reports pertaining to the Site. Based on this evidence, U.S. EPA has information indicating that you are a potentially responsible party with respect to this Site.

B. The current PRP Group has conducted the following studies and/or activities at the Site.

1. 1986 Removal Action - removed and disposed of contaminated soil, disposal of contents of 215-55 gallon drums and backfill of excavated areas.
2. Remedial Investigation - to determine the nature and extent of contamination at the Site.
3. 1988 Removal Action - conducted by a group of 5 PRPs, removed and disposed of additional contaminated soil and drums, disposal of 23 horizontal tank contents, and fencing.
4. Feasibility Study - to evaluate the feasibility of possible alternatives to remediate the Site contamination identified during the Remedial Investigation.
5. U.S. EPA released it's Proposed Plan for the site remediation on January 22, 1990.
6. U.S. EPA issued it's Record of Decision for the WRR site remediation on March 30, 1990.

C. Past Costs: As of October 17, 1989, \$622,066.58 have been expended by U.S. EPA at this Site. The PRPs have been billed for oversight costs and to date have paid \$56,588.02 towards their bills. Therefore, past costs incurred by the U.S. EPA as of October 17, 1989 are \$565,478.56. Following that date, U.S. EPA has incurred, and will incur, additional response costs regarding the WRR site.

**ATTACHMENT II**

The names and addresses of all parties receiving a copy of this letter are attached.

**CURRENT WRR PRP GROUP STEERING COMMITTEE**

William N. Hall  
Breed, Abbott & Morgan  
1875 Eye Street, N.W.  
Washington, D.C. 20006  
(202) 466-1118

Christopher J. Dunskey  
Honigman Miller Schwartz and Cohn  
2290 First National Building  
Detroit, Michigan 48226  
(313) 256-7872

\*\*\* ISO FOREGROUND HARDCOPY \*\*\*  
DSNAME=CPESSAI.FOCUS.OPPLINE

Wayne Waste Oil Site  
List of PRA's  
to be sent

Special Notice Letters in Feb 1990

Received from ADP on 1/16/90

LINE UP THESE LABELS PLEASE! THEY ARE FOR B116  
LINE UP THESE LABELS PLEASE! THEY ARE FOR WAYNEOIL  
LINE UP THESE LABELS PLEASE! THEY ARE FOR WAYNEOIL  
LINE UP THESE LABELS PLEASE! THEY ARE FOR WAYNEOIL

900116  
A OF I  
C/O MELVIN A. ATKIN  
P.O. BOX 70  
HAMILTON, IN\_46742

1 900116  
ADMETCO, INC. SCRAP METALS  
7625 VICKSBURG PIKE  
FORT WAYNE, IN\_46804

3 900116  
BLUFFTON LIGHT AND WATER  
128 EAST MARKET  
BLUFFTON, IN\_46714

4 900116  
BROOKS CONSTRUCTION  
P.O. BOX 9560  
FORT WAYNE, IN\_46899

2 900116  
ANGOLA DIE CASE  
410 WEATHERHEAD STREET  
ANGOLA, IN\_46703

6 900116  
E.R. CARPENTER  
195 COUNTY ROAD 15 SOUTH  
P.O. BOX 2386  
ELKHART, IN\_46515

7 900116  
CELOTEX CORP.  
P.O. BOX 157  
LAGRO, IN\_46941

5 900116  
L.M. CARRIDE  
4420 CLUBVIEW DRIVE  
FORT WAYNE, IN\_46804

9 900116  
ERIE STONE  
500 ERIE STONE ROAD  
HUNTINGTON, IN\_46750

10 900116  
EXIDE CORP.  
303 WATER STREET  
LOGANSPOUT, IN\_46947

8 900116  
CENTRAL STEEL & WIRE CO.  
C/O PRENTICE-HALL CORP. SYSTEM  
CIRCLE TOWER BUILDING  
INDIANAPOLIS, IN\_46204

12 900116  
WILLIAM J. FRANKS, PRESIDENT  
FRANKS PLATING WORKS, INC.  
2109 E. WASHINGTON BOULEVARD  
FORT WAYNE, IN\_46714

13 900116  
FRICTION MATERIALS  
1849 SADINE  
HUNTINGTON, IN\_46750

11 900116  
FIDLER'S  
P.O. BOX 99  
GOSHEN, IN\_46526

15 900116  
GRISSON APB (PERU)  
BASE CIVIL ENGINEER  
GRISSON APB, IN\_46971

16 900116  
HINCO WASTE-AWAY SERVICE, INC.  
707 W. WILDWOOD AVENUE  
ELKHART, IN\_46750

14 900116  
GOSHEN TOWN & TOWN  
409 WEST LINCOLN AVENUE  
GOSHEN, IN\_46526

18 900116  
HOWARD MARTIN HEAVY HAULERS  
4315 MEYER ROAD  
FORT WAYNE, IN\_46806

19 900116  
HY-MATIC MFG., INC.  
W. OHIO STREET  
KENDALLVILLE, IN\_46755

17 900116  
HOOK INDUSTRIAL SALES  
2731 BROOKLYN AVENUE  
FORT WAYNE, IN\_46804

21 900116  
JESSEN MFG.

22 900116  
S.P. JOHNSON

23 900116  
INCO ALLOYS

Wayne Waste Oil Site  
List of PRA's to be sent  
Special Notice Letters in  
Feb 1990



Jessen Mfg.  
P.O. BOX 1727  
ELKHART, IN\_46516

24 900116  
KEY MACHINE TOOL, INC.  
53928 COUNTY ROAD, SW  
P.O. BOX 1004  
ELKHART, IN\_46515-1004

27 900116  
HARTINS INC.  
P.O. BOX 522  
FORT WAYNE, IN\_46815

30 900116  
NOTE CONSTRUCTION  
P.O. BOX 229  
UNION CITY, IN\_47390

33 900116  
NIPSCO  
114 E. WAYNE STREET  
FORT WAYNE, IN\_46802

36 900116  
MORRIS TRUCKING  
P.O. BOX 31  
U.S. 20 WEST  
LAGRANGE, IN\_46761

39 900116  
DMV, INC.  
486 W. COUNTY ROAD  
300 NORTH  
WARSAW, IN\_46580

42 900116  
REITH REILLY  
P.O. BOX 1108  
ELKHART, IN\_46515

45 900116  
SIBERLING MFG.  
2010 GUY BROWN DRIVE  
DECATUR, IN\_46733

SE Johnson  
201 S. THOMAS ROAD  
FORT WAYNE, IN\_46808

25 900116  
KRIZMAN  
1141 E. 12TH STREET  
MISHAWAKA, IN\_46544

28 900116  
MCGILL MFG.  
705 W. 6TH STREET  
MONTICELLO, IN\_47960

31 900116  
NORTHERN INDIANA MANUFACTURING  
105 S. TRAYER  
BOURBON, IN\_46504

34 900116  
NIPSCO  
232 SO. MAIN STREET  
GOSHEN, IN\_46526

37 900116  
MUCOR FASTENERS  
P.O. BOX 6100  
ST. JOE, IN\_46785

40 900116  
PRECISION PIECE PARTS  
712 SOUTH LEXUS  
MISHAWAKA, IN\_46544

43 900116  
REITH RILEY CONSTRUCTION  
P.O. BOX 477  
GOSHEN, IN\_46526

46 900116  
STRAUSS, INC.  
P.O. BOX 149  
NORTH MANCHESTER, IN\_46962

Inco Alloys  
5280 HIGGINS BOULEVARD  
ELKHART, IN\_46507

23 900116  
~~KENDALLVILLE IRON & STEEL~~ *Cristing*  
~~P.O. BOX 69~~ P.O. Box 337  
KENDALLVILLE, IN\_46755

26 900116  
MACALLISTER MACHINERY  
P.O. BOX 8944  
FORT WAYNE, IN\_46808

29 900116  
MINNICH MFG.  
2421 W. WALLEN ROAD  
FORT WAYNE, IN\_46818

32 900116  
NIPSCO  
420 BROADWAY  
CHESPERTON, IN\_46304

35 900116  
NIPSCO  
101 S. MICHIGAN STREET  
PLYMOUTH, IN\_46563

38 900116  
O'BRIEN CORP.  
Rt. 1  
SOUTH BEND, IN\_46628

41 900116  
RCJ MANUFACTURING  
1420 STANLEY DRIVE  
PLYMOUTH, IN\_46563

44 900116  
SHELLER GLOBE  
16836 STATE RD 37  
GRABILL, IN\_46741

48 900116  
TOOL CRAFT  
2620 ADAMS CENTER ROAD  
FORT WAYNE, IN\_46803

51 900116  
UNIROYAL  
P.O. BOX 950  
STATE ROAD 15 NORTH  
WARSAW, IN\_46580

54 900116  
WARNER & SONS CONSTRUCTIONS  
29099 U.S. HIGHWAY 33 W  
ELKHART, IN\_46516

57 900116  
A. MATTERSLEY & SON  
P.O. BOX 5366  
3939 MOBILE AVENUE  
FORT WAYNE, IN\_46895

60 900116  
ALECTRICO, INC.  
55800 CUMMANT ROAD  
P.O. BOX 690  
MISHAWAKA, IN\_46544

63 900116  
ANOCO OIL COMPANY  
200 E. RANDOLPH DRIVE  
CHICAGO, IL\_60601

66 900116  
NARTHA BUNNELLS MOYER  
SR. ATTORNEY, ABE PIPELINE CO.  
500 RENAISSANCE CENTER  
C/O ONE WOODARD AVE.  
DETROIT, MI\_48263

69 900116  
ASHLEY WARD, INC.  
56883 ELKHART COURT  
ELKHART, IN\_46516

72 900116  
BASTIAN PLATING CO., INC.  
625 W. 15TH STREET  
AUBURN, IN\_46706-2133

49 900116  
TRUMBALL & SONS  
P.O. BOX 87  
LARNILL, IN\_46764

52 900116  
UNITED TOOL  
P.O. BOX 1352  
ELKHART, IN\_46575

55 900116  
WEIL-MCLAIN  
DIVISION OF HARLEY CO.  
BLAINE STREET  
MICHIGAN CITY, IN\_46360

58 900116  
ACTIVE PRODUCTS CORP.  
HERBERT A. SPITZER, JR.  
ATTORNEY AT LAW  
P.O. BOX 927  
MARION, IN\_46852

61 900116  
GARY CROUTH  
ALUMINUM COMPANY OF AMERICA  
1501 ALCOA BUILDING  
PITTSBURGH, PA\_15219

64 900116  
ANACONDA POWER CABLE COMPANY  
EAST EIGHTH  
MARION, IN\_46952

67 900116  
APOLLO DISPOSAL  
P.O. BOX 410  
ANGOLA, IN\_46703

70 900116  
AUSTIN PETROLEUM  
99 E. JOE STREET  
MUNTINGTON, IN\_46750

73 900116  
JOHN BARCOT  
130 E. SUTTENFIELD  
FORT WAYNE, IN\_46803

47 900116  
TGM RUBBER  
1102 S. 10TH STREET  
P.O. BOX 516  
GOSHEN, IN\_46526

50 900116  
U.S. GRANULES  
P.O. BOX 130  
1433 WESTERN AVENUE  
PLYMOUTH, IN\_46563

53 900116  
WALKER MFG.  
P.O. BOX 352  
LIGONIER, IN\_46767

56 900116  
YODER OIL  
P.O. BOX 10  
ELKHART, IN\_46515

59 900116  
ALBION WIRE  
P.O. BOX 156  
STATE ROAD 8 EAST  
ALBION, IN\_46701

62 900116  
MR. REECE PRATHER  
AMCAST INDUSTRIAL CORPORATION  
P.O. BOX 98  
DAYTON, OH\_45401

65 900116  
ANGLIN COMPANIES, INC.  
1402 W. MAIN  
FORT WAYNE, IN\_46804

68 900116  
ARLD SMITH  
RURAL ROUTE 5  
COLUMBIA CITY, IN\_46725

71 900116  
BPC MFG.  
DIVISION OF BRISTOL CORP.  
1755 W. OAK ROAD  
PLYMOUTH, IN\_46563-0599

75 900116  
BLUFFTON POWER PLANT  
514 E. WASHINGTON  
BLUFFTON, IN\_46714

78 900116  
BRENNAN CASTING  
500 N BALTIMORE  
BRENNAN, IN\_46506

81 900116  
DARYL LAMBERT  
C AND R BARREL PLATING CORP.  
COLUMBIA CITY, IN\_46725

84 900116  
CHEMICAL LEMMAN TANKLINES  
5606 SOUTH U.S. HIGHWAY 421  
WESTVILLE, IN\_46391

87 900116  
CITY ENGINEER'S OFFICE  
WATER POLLUTION CONTROL  
CITY HALL  
FORT WAYNE, IN\_46803

90 900116  
DONALD S. COLWELL  
COLWELL/GENERAL, INC.  
P.O. BOX 329  
FORT WAYNE, IN\_46801

93 900116  
RICHARD D. TREPLE  
COOPER TIRE AND RUBBER COMPANY  
FINDLAY, OH\_45840

96 900116  
COVER-ALL RENTAL SERVICE  
3201 BROOKLYN AVENUE  
FORT WAYNE, IN\_46809

99 900116  
CUSTARD INSURANCE ADJUSTERS, INC.  
P.O. BOX 10479

76 900116  
BOCK PRODUCTS  
1901 W. NIZELY  
ELKHART, IN\_46517

79 900116  
CHARLES R. CAMPBELL  
PLANT ENGINEER, BRODERICK CO.  
500 LINCOLN STREET  
DIVISION OF MARSCO CORPORATION  
MUNCIE, IN\_47302

82 900116  
CARTER LUMBER COMPANY  
5625 PENDELTON  
ANDERSON, IN\_46011

85 900116  
CHENSOLV, INC.  
604 S. SCOTT  
P.O. BOX 1433  
SOUTH BEND, IN\_46624-1433

88 900116  
CHI WABASH CAST, INC.  
P.O. BOX 668  
WABASH, IN\_46992

91 900116  
COLWELL/GENERAL, INC.  
J. MICHAEL O'HARA, ESQ.  
P.O. BOX 2263  
BARRETT, BARRETT & MCHAGNY  
FORT WAYNE, IN\_46801

94 900116  
RICHARD D. TREPLE  
COOPER TIRE AND RUBBER COMPANY  
FINDLAY, OH\_45840

97 900116  
CRANE EDMUND  
550 NORTH BROADWAY  
BUTLER, IN\_46721

100 900116  
JOHN CANAN  
VICE PRESIDENT, ENGINEERING

74 900116  
CHARLES V. CHAFFEE, PRESIDENT  
BLUFFTON RUBBER CO., INC.  
P.O. BOX 255  
BLUFFTON, IN\_46714

77 900116  
LINDA J. SZEMBACH  
BORG-WARNER CORPORATION  
200 SOUTH MICHIGAN AVENUE  
CHICAGO, IL\_60604

90 900116  
BUNGE CORP. OF INDIANA  
HIGHWAY 25  
P.O. BOX 180  
LOGANSPORT, IN\_45947-0188

93 900116  
CENTRE PROPERTIES, LTD.  
19 S. LASALLE  
CHICAGO, IL\_60603

96 900116  
TIMOTHY J. BLOOM  
CITY OF COLUMBIA CITY, CITY HALL  
CHAUNCEY STREET  
COLUMBIA CITY, IN\_46725

89 900116  
COACHMAN INDUSTRIES  
601 E. BEARDSLEY  
ELKHART, IN\_46515

92 900116  
CONCORDIA THEOLOGICAL SEMINARY  
6600 N. CLINTON  
FORT WAYNE, IN\_46825

95 900116  
RAYMOND C. HARTER  
DIVISION COUNSEL  
CORNING GLASS WORKS  
LEGAL DEPARTMENT  
CORNING, NY\_14831

98 900116  
ELIZABETH BOTTORFF AHLEMAN  
CTS CORPORATION

FORT WAYNE, IN\_46852

102 900116  
DAYCO CORPORATION  
1200 W. MICHIGAN AVENUE  
THREE RIVERS, MI\_49093

105 900116  
DEKALB MOLDED PLASTICS  
U.S. HIGHWAY 6 WEST  
BUTLER, IN\_46721

108 900116  
DIESTER MACHINE  
1933 E. WAYNE STREET  
FORT WAYNE, IN\_46803

111 900116  
DOUGLASS CONSTRUCTION CO., INC.  
4777 REED ROAD  
FORT WAYNE, IN\_46815

114 900116  
E-REC-TO  
P.O. BOX 846  
MISHAWAKA, IN\_46544

117 900116  
EDGERTON METAL PRODUCTS, INC.  
210 E. BENNETT  
EDGERTON, OH\_43517

120 900116  
MILES C. GEMBERING  
BARRETT, BARRETT & MCHAGNY  
P.O. BOX 2263  
ELECTRIC MOTORS & SPECIALTIES INC  
FORT WAYNE, IN\_46801

123 900116  
ELMHURST BUS GARAGE  
FORT WAYNE SCHOOL DISTRICT  
6006 ARDMORE AVENUE  
FORT WAYNE, IN\_46809

126 900116

P.O. BOX 1388  
DALTON FOUNDRIES, INC.  
MARIETTA, OH\_45750

103 900116  
LARRY L. FUCKER  
DAYTON-WALTHER CORPORATION  
600 EAST HIGHLAND AVENUE  
MUNCIE DIVISION  
MUNCIE, IN\_47303

106 900116  
STEVEN L. ARTUSI, ESQ.  
CORPORATE COUNSEL DE PUTY  
P.O. BOX 388  
MARIETTA, IN\_46580

109 900116  
DOTCO COPPER AIR TOOLS  
4030 STATE ROUTE 18  
MICKSVILLE, OH\_43526

112 900116  
Dwyer Instrument  
55 WARD  
MAKARUSA, IN\_46360

115 900116  
ROBERT E. DRYDEN  
ASSOCIATE COUNSEL, E-SYSTEMS INC.  
P.O. BOX 660248  
DALLAS, TX\_75266

118 900116  
EDON MACHINE DIVISION  
SIMPSON INDUSTRIES, INC.  
W. INDIANA  
EDON, OH\_43518

121 900116  
ELKHART PRODUCTS CORP.  
700 RAINBOW ROAD  
GENEVA, IN\_46740

124 900116  
ELCO PRODUCTS  
P.O. BOX 387  
NEW HAVEN, IN\_46774

127 900116

905 NORTH WEST BOULEVARD  
ELKHART, IN\_46514

101 900116  
CLEMENT A. REVETTI  
LEGAL COUNSEL  
P.O. BOX 1000  
DANA CORPORATION  
TOLEDO, OH\_43697

104 900116  
DEKALB CENTRAL SCHOOL DISTRICT  
P.O. BOX 503  
AUBURN, IN\_46705

107 900116  
WM. A. DIDIER & SONS  
613 HIGH STREET  
P.O. BOX 10748  
FORT WAYNE, IN\_46853-0748

110 900116  
MR. NORBERT P. SINDREL  
MANUFACTURING ENGINEERING MANAGER  
141 RAILROAD STREET  
DOUGLAS COMPONENTS CORPORATION  
BROWNSON, MI\_49028

113 900116  
DYNAMIC POWER CORPORATION  
RURAL ROUTE 2  
P.O. BOX 148  
OSSIAN, IN\_46777

116 900116  
KATHRYN L. GOETZ, ATTORNEY  
EAGLE-PICHER INDUSTRIES, INC.  
P.O. BOX 779  
CINCINNATI, OH\_45201

119 900116  
ELCO INDUSTRIES, INC.  
P.O. BOX 606  
LOGANSPOUT, IN\_46947

122 900116  
CITY OF ELKHART  
CITY MUNICIPAL BUILDING  
229 S. 2ND.  
ELKHART, IN\_46516

125 900116

EXACTO, INC. OF SOUTH BEND  
1137 S. LAFAYETTE  
P.O. BOX 597  
SOUTH BEND, IN\_46624

129 900116  
PLEX STEEL INDUSTRIES, INC.  
P.O. BOX 129  
NEW PARIS, IN\_46553

132 900116  
ROY S. NOWAKOWSKI  
FRANKLIN ELECTRIC COMPANY, INC.  
400 EAST SPRING STREET  
BLUFFTON, IN\_46714

135 900116  
G.C.G. ENTERPRISES  
2204 LIBERTY DRIVE  
MISHAWAKA, IN\_46544

138 900116  
THOMAS H. ARMSTRONG  
COUNSEL-ENVIRONMENTAL ISSUES  
GENERAL ELECTRIC COMPANY  
FAIRFIELD, CT\_06431

141 900116  
DAVID C. LEE  
STATE GENERAL COUNSEL & SEC.  
P.O. BOX 407  
GENERAL TELEPHONE COMPANY  
WESTFIELD, IN\_46704

144 900116  
JOHN BOSS  
VICE PRESIDENT - E.P.A.  
111 EAST BROAD STREET  
GRIPCO FASTENERS DIVISION OF NITE  
SOUTH WHITELY, IN\_46787

147 900116  
KENDRICKSON TANDEN CORP.  
BOLIN INVESTMENTS, INC.  
P.O. BOX 927  
KENDALLVILLE, IN\_46755

150 900116  
HOOK IND. SALES  
2731 BROOKLYN AVENUE  
FORT WAYNE, IN\_46804

LAUREN H. HORISZNY  
CORPORATE COUNSEL  
2655 COOLIDGE  
EX-CELL-O CORP.  
TROY, MI\_48064

130 900116  
FORT WAYNE AIR SERVICE  
(RA) JOHN DILLEY  
4021 AIR ST. BARRFIELD  
FORT WAYNE, IN\_46809

133 900116  
FREMONT MFG.  
DIVISION OF SIMPSON IND. INC.  
S. YILLOTSON  
FREMONT, IN\_46737

136 900116  
GASOLINE EQUIPMENT SRV. CO., INC.  
P.O. BOX 10474  
FORT WAYNE, IN\_46852

139 900116  
D. W. MORNHAN  
MANAGER-ENVIRONMENTAL PROGRAMS  
P.O. BOX 2230  
GENERAL ELECTRIC COMPANY  
FORT WAYNE, IN\_46801

142 900116  
GENEVA SCREW MACHINE PRODUCTS INC  
U.S. 27 W.  
P.O. BOX 241  
ROUTE 1  
GENEVA, IN\_46740

145 900116  
HAGENMAN CONSTRUCTION CORP.  
501 W. WASHINGTON BOULEVARD  
FORT WAYNE, IN\_46802

148 900116  
MILLSDALE TOOL & MFG. CO.  
135 E. SOUTH  
MILLSDALE, MI\_49242

151 900116  
HOOVER DRAINAGE  
GRINN ROAD  
HUNTINGTON, IN\_46750

ESSEX INTERNATIONAL, INC.  
UNITED TECHNOLOGY CORPORATION  
UNITED TECHNOLOGY BUILDING  
HARTFORD, CT\_06101

128 900116  
FLATLOW, INC.  
1610 CIRCLE  
SOUTH BEND, IN\_46628

131 900116  
FORT WAYNE WATER  
POLLUTION CONTROL PLANT  
2601 DWENGER AVENUE  
FORT WAYNE, IN\_46803

134 900116  
G-C SERVICE CO.  
GLENBROOK SQUARE SHOPPING CENTER  
FORT WAYNE, IN\_

137 900116  
GATES CHEVROLET CORP.  
401 S. LAFAYETTE  
SOUTH BEND, IN\_46601

140 900116  
GENERAL PETROLEUM, INC.  
3919 MOBILE  
FORT WAYNE, IN\_46805

143 900116  
GENJOVA, INC.  
7034 E. COURT  
DAVISON, MI\_48423

146 900116  
TON HARGETT  
FRUENAUFF CORP.  
LIQUID AND BULK TANK DIVISION  
P.O. BOX 660  
FORT WAYNE, IN\_46801

149 900116  
HOLMES AND COMPANY  
807 EAST ELLSWORTH  
P.O. BOX 370  
COLUMBIA CITY, IN\_46725

153 900116  
ITT AEROSPACE/OPTICAL DIVISION  
DIVISION OF ITT CORP.  
P.O. BOX 3700  
FORT WAYNE, IN\_46801-3701

156 900116  
INDIANA DIE HOLDING  
DIVISION OF HARNET INDUSTRIES INC  
9100 FRONT STREET  
FORT WAYNE, IN\_46818-2209

159 900116  
JANESON CORP. OF INDIANA  
209 W. OHIO STREET  
P.O. BOX 247  
KENDALLVILLE, IN\_46755-2015

162 900116  
JOSAN MANUFACTURING COMPANY  
1508 EAST SECOND STREET  
MICHIGAN, IN\_46360

165 900116  
KREAGER BROTHERS EXCAVATING  
RURAL ROUTE 1  
CROWNELL, IN\_46732

168 900116  
KERR GLASS MANUFACTURING CORP.  
524 EAST CENTER  
DUNKIRK, IN\_47336

171 900116  
(NA) GENE LOPSHIRE  
401 W. FAIRFAX  
FORT WAYNE, IN\_46807

174 900116  
LINCOLN MANUFACTURING COMPANY INC  
P.O. BOX 1229  
FORT WAYNE, IN\_46801

177 900116  
LYDELL, INC.,  
ELASTOMER PRODUCTS GROUP  
P.O. BOX 29  
Green Bay, WI

154 900116  
IMCO, INC.  
P.O. BOX 444  
HUNTINGTON, IN\_46750

157 900116  
INDUSTRIAL FUEL OILS, INC.  
1702 S. FAIRFIELD AVENUE  
FORT WAYNE, IN\_46804

160 900116  
JIM KELLY BUICK, INC.  
1819 S. CALHOUN  
FORT WAYNE, IN\_46804

163 900116  
JOY MANUFACTURING COMPANY  
301 GRANT STREET  
PITTSBURGH, PA\_15219

166 900116  
KOONTZ EQUIPMENT  
6946 LILAC ROAD  
PLYMOUTH, IN\_46563

169 900116  
LARDEN CORP.  
RENEE R. HANNINNEY  
11 S. MERIDIAN ST. SUITE 1313  
BARNES AND THORNBURG  
INDIANAPOLIS, IN\_46204

172 900116  
LINE CITY MFG. CO., INC.  
1470 EYNA AVENUE  
P.O. BOX 509  
HUNTINGTON, IN\_46750-3640

175 900116  
LOBDELL-EMERY MFG. CO.  
10650 17TH STREET  
ARGOS, IN\_46501-9703

178 900116  
ZANKY, INC.  
100 PROGRESS WAY W.  
AVILLA, IN\_46710

152 900116  
THOMAS L. ALDRICH  
ASSISTANT GENERAL COUNSEL  
2700 SANDERS ROAD  
HOUSEHOLD MANUFACTURING, INC.  
PROSPECT HEIGHTS, IL\_60070

155 900116  
INDIANA AIR NATIONAL GUARD  
BAER FIELD  
FORT WAYNE, IN\_46804

158 900116  
INTERNATIONAL HARVESTER COMPANY  
2701 COLISEUM BOULEVARD  
P.O. BOX 596  
FORT WAYNE, IN\_46801

161 900116  
JOHNSON PRODUCTS  
2100 STERLING AVENUE  
ELKHART, IN\_46516

164 900116  
K. MART DISTRIBUTION CENTER  
P.O. BOX 359  
FORT WAYNE, IN\_46801

167 900116  
KITCHEN QUIP, INC.  
WILLIAM L. SWEET, JR.  
P.O. BOX 2263  
BARRETT, BARRETT & MCMAGNY  
FORT WAYNE, IN\_46801

170 900116  
RUFUS H. CRAIG, DIRECTOR OF LAW  
MACHILLAN ALJEDAL, INC.  
P.O. BOX 366  
PINE HILL, AL\_36769

173 900116  
LIMESTONE PRODUCTS, INC.  
P.O. BOX 618  
PORTLAND, IN\_47371

176 900116  
LOCK JOINT FIB COMPANY, INC.  
1400 RIVERSIDE DRIVE  
P.O. BOX 239  
South Bend, IN\_46624

GERBER STREET  
LIGONIER, IN\_46767-0491

180 900116  
THOMAS M. NAPHER, ESQ.  
MAGNAVOX CONSUMER ELECTRIC CO.  
P.O. BOX 14810  
NORTH AMERICAN PHILIPS COMPANY  
KNOXVILLE, TN\_37914

183 900116  
MARTIN OIL  
4501 127TH ALEST  
BLUE ISLAND, IL\_60406

186 900116  
MCCORD HEAT TRANSFER CORP.  
500 W. HARRISON STREET  
PLYMOUTH, IN\_46563-1324

189 900116  
MEANS SERVICE, INC.  
(RA) CT CORP.  
1 W. CAPITAL AVENUE  
INDIANAPOLIS, IN\_46240

192 900116  
MISHAWAKA CITY SCHOOLS  
1402 S. MAIN  
MISHAWAKA, IN\_46544

195 900116  
MYERS SEPTIC SERVICE  
ROUTE 3  
LIGONIER, IN\_46767

198 900116  
NATIONAL HEAT TREATING CORP.  
1621 S. MONROE  
FORT WAYNE, IN\_46803

201 900116  
NIPSCO  
5265 HODMAN AVENUE  
HAMMOND, IN\_46320

204 900116  
ONTARIO FORGE CORPORATION

181 900116  
D.T. CARLTON  
MAGNAVOX COV. & INDUSTRIAL  
1313 PRODUCTION ROAD  
ELECTRONICS COMPANY  
FORT WAYNE, IN\_46808

184 900116  
STEPHEN T. BENIS  
ASSISTANT CORPORATE COUNSEL  
21001 VAN BORN ROAD  
NASOD INDUSTRIES, INC.  
TAYLOR, MI\_48180

187 900116  
MCDONELL ENTERPRISES, INC.  
JAMES W. WOODSHALL, ESQ.  
121 W. FRANKLIN STREET, STE 400  
HARRICK, WEAVER, & BOYD  
ELKHART, IN\_46516

190 900116  
HEER HACE, INC.  
6529 MAPLEDOWN DRIVE  
FORT WAYNE, IN\_46815

193 900116  
MONSANTO  
910 GERBER STREET  
LIGONIER, IN\_46767

196 900116  
MAAS FOOD  
RURAL ROUTE 5  
PORTLAND, IN\_47371

199 900116  
MORPORK & WESTERN RAILWAY CO.  
8111 NELSON ROAD  
FORT WAYNE, IN\_46803

202 900116  
NORTHERN INDIANA PUBLIC SRVS. CO  
5265 HODMAN AVENUE  
HAMMOND, IN\_46320

205 900116  
ORTON-MCCULLOUGH CRANE

SOUTH BEND, IN\_46624

179 900116  
ZOLLNER CORPORATION  
HILES C. GERBERDING  
P.O. BOX 2263  
BARRETT, BARRETT & MCNAGNY  
FORT WAYNE, IN\_46801

192 900116  
MAPLEWOOD SHELL SERVICE  
6132 STELLHORN ROAD  
FORT WAYNE, IN\_46815

195 900116  
MATERIALS HANDLING EQUIPMENT CORP  
7433 US HIGHWAY 30 E.  
FORT WAYNE, IN\_46803

198 900116  
W.A. AILES  
VICE PRESIDENT-TREASURER  
909 W. LAFAYETTE STREET  
MCGILL MANUFACTURING CO. INC,  
VALPARAISO, IN\_46383

191 900116  
METALLURGICAL PROCESSING, INC.  
3715 E. WASHINGTON BOULEVARD  
P.O. BOX 10842  
FORT WAYNE, IN\_46854-0842

194 900116  
MOORE BUSINESS FORMS  
WEST HILL  
ANGOLA, IN\_46703

197 900116  
R.M. RIVETNA, MANAGER  
ENVIRONMENTAL ENGINEERING  
8101 WEST HIGGINS ROAD  
NATIONAL CAN CORP.  
CHICAGO, IN\_60631

200 900116  
NORTH AMERICAN VAN LINES, INC.  
5001 U.S. HIGHWAY 30 W.  
FORT WAYNE, IN\_46410

203 900116  
O.P.C. MEDICAL SYSTEMS

Ontario Forge Corporation  
1200 WEST JACKSON STREET  
P.O. BOX 2757  
MUNCIE, IN\_47303

207 900116  
PHD CO.  
4763 N. U.S. 24 E.  
HUNTINGTON, IN\_46750-9617

210 900116  
POORMAN'S HEATING AND AIR  
CONDITIONING SERVICE, INC.  
1417 MARTIN  
PORT WYNE, IN\_46802

213 900116  
R.J. RINA, SUPERVISOR  
ENVIRONMENTAL AFFAIRS  
P.O. BOX 1388  
PANHANDLE EASTERN PIPELINE CO.  
KANSAS CITY, MO\_64141

216 900116  
MONICA M. POMMAN, SR. ATTORNEY  
R.R. DONNELLEY & SONS  
2223 MARTIN LUTHER KING DRIVE  
CHICAGO, IL\_60616

219 900116  
RENCO OIL  
P.O. BOX 610  
MISHAWAKA, IN\_46544

222 900116  
ROPPE RUBBER CORP.  
101 INDUSTRIAL DRIVE  
ANGOLA, IN\_46703-1045

225 900116  
SEANCO  
503 E. BROAD  
SOUTH WHITLEY, IN\_46787

228 900116  
SHELL CAR WASH  
1001 W. 7TH  
AUBURN, IN\_46706

Orten-McCullough Crane  
P.O. BOX 846  
MISHAWAKA, IN\_46544

204 900116  
DAINE W. SKINNER  
ASSISTANT RISK MANAGER  
P.O. BOX 943  
PHILLIPS INDUSTRIES, INC.  
DAYTON, OH\_45401

211 900116  
POWER PLANT SERVICE, INC.  
2010 LAKEVIEW ROAD  
PORT WYNE, IN\_46808-3922

214 900116  
RONALD R. RICHY  
PRECISION PLASTICS, INC.  
P.O. BOX 329  
COLUMBIA CITY, IN\_46725

217 900116  
RACO, INC.  
HARVEY RUSSELL, INC.  
P.O. BOX 4002  
MISHAWAKA, IN\_46755

220 900116  
REDSBERGER OIL  
1604 ROPEL  
SOUTH BEND, IN\_46628

223 900116  
HYDER TRUCK RENTAL  
PORT WYNE LEASING  
P.O. BOX 419  
PORT WYNE, IN\_46801

226 900116  
SHANBAM & CO., INC.  
2531 BRENER DRIVE  
PORT WYNE, IN\_46803

229 900116  
SMELLER GLOBE  
P.O. BOX 962  
TOLEDO, OH\_43697

AEC Medical Systems  
501 ARJONNE ROAD  
WARSAW, IN\_46580

206 900116  
PAR-TRE COMPANY, INC.  
STATE ROAD ONE  
SPENCERVILLE, IN\_46744

209 900116  
PLYMOUTH COMMUNITY SCHOOLS  
701 EAST BERKELEY STREET  
PLYMOUTH, IN\_46563

212 900116  
PRAIRIE VIEW LANDFILL  
P.O. BOX 128  
WYATT, IN\_46595

215 900116  
PRINCO, INC.  
P.O. BOX 9782  
PORT WYNE, IN\_46899

218 900116  
RECLAIMER, INC.  
P.O. BOX 610  
MISHAWAKA, IN\_46755

221 900116  
ROCKWELL INTERNATIONAL  
1001 W. CULVER ROAD  
KNOX, IN\_46534

224 900116  
RYDER TRUCK RENTAL & LEASING  
DISTRICT OFFICE  
5225 NEW HAVEN AVENUE  
PORT WYNE, IN\_46803

227 900116  
SHANE & HIAFT MARATHON  
P.O. BOX 125  
SWAYZEE, IN\_46986



231 900116  
SHOAPP PARK BAPTIST CHURCH  
6651 ST. JOE ROAD  
FORT WAYNE, IN\_46815

234 900116  
SIBLEY MACHINE & FOUNDRY CORP.  
206 EAST TUTT STREET  
P.O. BOX 40  
SOUTH BEND, IN\_46624

237 900116  
STANADYNE, INC.  
SIDNEY MARGOUS, ESQ.  
1 FIRST NATIONAL PLAZA, STE. 5000  
WINSTON AND STRAUB  
CHICAGO, IL\_60603

240 900116  
STOUTCO, INC.  
1 STOUTCO DRIVE  
P.O. BOX 307  
BRISTOL, IN\_46507-0307

243 900116  
SUPERIOR CO., INC.  
1610 CALHOUN STREET  
FORT WAYNE, IN\_46808-2408

246 900116  
SUPREME CORP.  
16500 COUNTY ROAD 28  
P.O. BOX 463  
GOSHEN, IN\_46526-9354

249 900116  
TTP, INC.  
ROUTE 8  
P.O. BOX 317  
WARSAW, IN\_46880

252 900116  
U.S. AVIEX CO.  
P.O. BOX 340  
1800 TERMINAL ROAD  
MILES, MI\_49120

255 900116  
UNITED STATES POST OFFICE  
424 SOUTH MICHIGAN  
SOUTH BEND, IN\_46601

232 900116  
STEFFEN'S JOHN DEERE  
SALES & SERVICE  
P.O. BOX 294  
BLUFFTON, IN\_46714

235 900116  
SINERMAN CONSTRUCTION  
5720 HUGENBERG ROAD  
FORT WAYNE, IN\_46818

238 900116  
STEFFEN WILLIAM & SON  
IMPLEMENTATION SHOP  
687 N. MAIN  
BLUFFTON, IN\_46714

241 900116  
STRAPSS, INC.  
22 S. MAIN STREET  
NORTH MANCHESTER, IN\_46060

244 900116  
SUPERIOR LINKEAGE  
2110 SUMMIT  
NEW HAVEN, IN\_46769

247 900116  
RUSSELL H. SUSAG, PHD., P.E.  
DIR, ENVIRONMENTAL REGULATORY  
P.O. BOX 33331  
AFFAIRS  
ST. PAUL, MN\_55133

250 900116  
VIC TRIPPEL PLUMBING, HEATING,  
AIR CONDITIONING, INC.  
545 N. 3 HISHAWA  
HISHAWA, IN\_46545

253 900116  
UNIROYAL PLASTICS CO., INC.  
312 N. HILL STREET  
P.O. BOX 2000  
HISHAWA, IN\_46544-1320

256 900116  
UNIVERSAL TOOL & STAMPING CO.  
GRANT VAN HORNE  
P.O. BOX 523  
AUBURN, IN\_46706

230 900116  
SHENKEL'S ALL STAR DAIRY, INC.  
1019 FLAXHILL ROAD  
HUNTINGTON, IN\_46750

233 900116  
SMALL PARTS, INC.  
P.O. BOX 23  
LOGANSPOUT, IN\_46947

236 900116  
SOUTH BEND LATHE  
400 W. SAMPLE STREET  
SOUTH BEND, IN\_46625

239 900116  
SUPERIOR WASTE SYSTEMS  
C/O ROGER ZEHNTER  
3003 BUTTERFIELD ROAD  
WASTE MANAGEMENT, INC.  
OAK BROOK, IL\_60521

242 900116  
SUN OIL COMPANY  
P.O. BOX 30  
HUNTINGTON, IN\_46750

245 900116  
SUPERIOR WASTE SYSTEMS  
54107 BUTTERNUT ROAD  
SOUTH BEND, IN\_46628

248 900116  
SYNDICATE SALES, INC.  
801 W. MORGAN  
KOKOMO, IN\_46901-2055

251 900116  
USA I - ENTERPRISES, INC.  
2501 LNW  
HISHAWA, IN\_46544

254 900116  
UNITED STATES GYPSUM CO.  
3501 CANAL STREET  
EAST CHICAGO, IN\_46312

258 900116  
VITREOUS STEEL  
900 E. WABASH AVENUE  
WAPPANEE, IN\_46550

261 900116  
WABASH FIBRE BOX CO.  
WESTON PAPER AND MFG. CO.  
FERGUSON ROAD, BAER FIELD  
PORT WAYNE, IN\_46809

264 900116  
JAN WATERS & ROGERS  
7603 NELSO ROAD  
PORT WAYNE, IN\_46803

267 900116  
WAYNE METAL PROTECTION CO.  
1511 WABASH AVENUE  
PORT WAYNE, IN\_46803-2146

270 900116  
WOODALL  
10261 S. INDIAN LAKE BOULEVARD  
INDIANAPOLIS, IN\_46236

259 900116  
VOLCRAFT  
COUNTY ROAD 60  
ST. JOE, IN\_46785

262 900116  
WABASH, INC.  
411 E. SOUTH  
HUNTINGTON, IN\_

265 900116  
JOE WATKINS  
RURAL ROUTE 4  
PORT WAYNE, IN\_46819

268 900116  
WAYNE RECLAMATION & RECYCLING INC  
LARRY BROCKMAN  
P.O. BOX 467  
DANIEL DRIVE  
COLUMBIA CITY, IN\_46725

271 900116  
WORLD COLOR PRESS  
CHEMICAL PLATE CORP.  
P.O. BOX 1248  
SPRINGHAM, IL\_62401

257 900116  
VALLEY MACHINE PRODUCTS  
1840 BORNEMAN AVENUE  
ELKHART, IN\_46517

250 900116  
WABASH ALLOYS, INC.  
DIVISION OF OGDEN CORP.  
P.O. BOX 466  
OLD U.S. 24 W.  
WABASH, IN\_46992-0466

263 900116  
WALKER TOOL  
1935 W. LUSHER  
ELKHART, IN\_46517

266 900116  
WAYNE HOME EQUIPMENT  
DIVISION OF SCOTT & PETZER  
801 GLASGOW AVENUE  
PORT WAYNE, IN\_46803-1344

269 900116  
WHITLEY PRODUCTS  
1403 STANLEY DRIVE  
PLYMOUTH, IN\_46563

272 900116  
KOLBY CORPORATION  
6932 GETTYSBURG PIKE  
PORT WAYNE, IN\_46804

**ATTACHMENT III**

**PROPOSED PLAN**

**WAYNE RECLAMATION AND RECYCLING SITE  
COLUMBIA CITY, INDIANA**

## WAYNE RECLAMATION AND RECYCLING PROPOSED PLAN COLUMBIA CITY, INDIANA

### INTRODUCTION

This Proposed Plan identifies the preferred option for cleaning up the contamination at the Wayne Reclamation and Recycling (WRR) site. In addition, the Plan includes summaries of other alternatives analyzed for this site. This document is issued by the U.S. Environmental Protection Agency (U.S. EPA), the lead agency for the site activities, and the Indiana Department of Environmental Management (IDEM), the support agency for this response action. U.S. EPA, in consultation with the IDEM, will select a final remedy for the site only after the public comment period has ended and the information submitted during this time has been reviewed and considered.

U.S. EPA is issuing this Proposed Plan as part of its public participation responsibilities under Section 117(a) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA). This document summarizes information that can be found in greater detail in the Remedial Investigation (RI) and Feasibility Study (FS) reports and other documents contained in the administrative record file for this site. U.S. EPA and the State encourage the public to review these other documents in order to gain a more comprehensive understanding of the site and Superfund activities that have been conducted there. The administrative record file, which contains the information upon which the selection of the response action will be based, is available at the following locations:

Peabody Library  
203 N. Main Street  
Columbia City, Indiana 46725

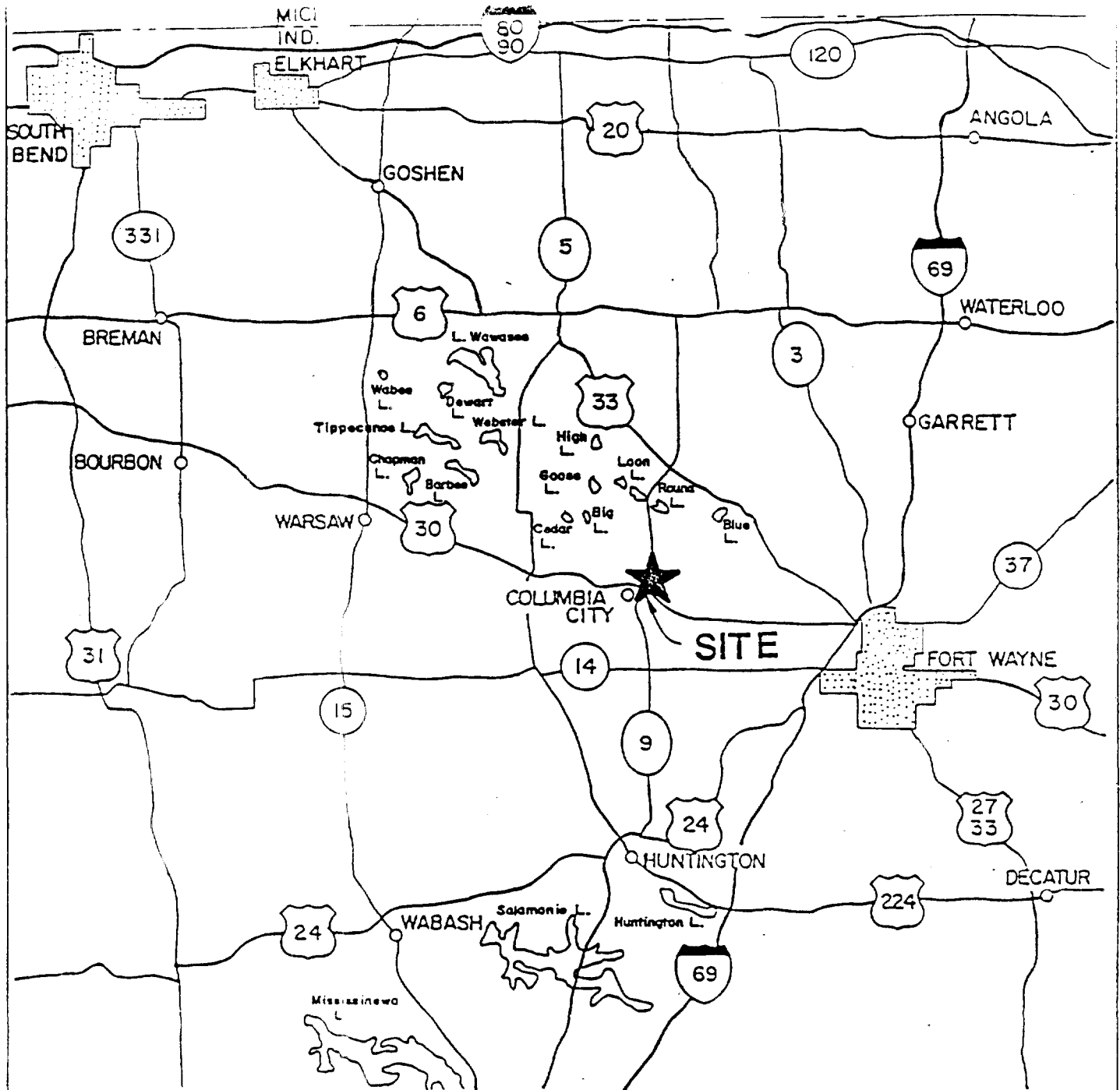
Columbia City Hall  
211 S. Chauncey Street  
Columbia City, Indiana 46725.

U.S. EPA, in consultation with the IDEM, may modify the preferred alternative or select another response action presented in the Plan and the RI/FS Reports based on new information or public comments. Therefore, the public is encouraged to review and comment on all the alternatives identified here.

### SITE BACKGROUND

#### Site History

WRR is an approximately 30 acre site, located on the southeast edge of the Columbia City limits (Figure 1). It is bounded on the south and east by the Blue River and on the west and northwest by a cemetery and residential area. The site includes approximately 20 acres currently owned by WRR, 6 acres in the north which WRR sold to Holmes & Company in 1982, and 4 acres on the west owned by Columbia City.



SCALE: 1"=10 MILES

FIGURE 1



WAYNE REGIONAL LOCATION MAP  
WAYNE RECLAMATION &  
RECYCLING FEASIBILITY STUDY  
COLUMBIA CITY INDIANA

INDIAN POST 11/10/78

In 1975, WRR purchased approximately 25 acres of land on the southeast edge of Columbia City, including a 13.6 acre portion that Columbia City owned since 1953. WRR and its division, Wayne Waste Oil, began operating an oil reclamation business at the site in 1975. In 1980, the Indiana State Board of Health (ISBH) began investigating the WRR site as a result of reports from a former WRR employee that hazardous wastes were being illegally disposed of at the site. ISBH determined that between February 1979 and May 1980, WRR filed hauler reports stating that it had disposed of 250,000 gallons of sludge at the Williams County landfill in Bryan, Ohio. However, the landfill had not received any waste shipments from WRR during that time.

In 1982, WRR and one of its principals, Wayne Brockman, pleaded guilty to illegal "depositing of contaminants" and filing false hauler reports. They were required to pay a fine, to fund a risk assessment of the site, and to pay for cleanup. WRR did not perform the cleanup required under its guilty plea.

The site (Figure 2) can be divided into three major areas: the southeast portion designated as the lower floodplain; the northeast portion designated as an old City landfill area; and the central and west portion, known as the uplands. The lower floodplain includes the areas which have been identified as the "freshwater pond", "oil decanting pit", "tar pit", "sludge ravine", "discolored area", "buried barrel area" and "acid pit". The old City landfill which Columbia City operated from 1953 to 1970, is in the northeast part of the site. Also included in this area is the "ink sludge area". The upland area includes the now inactive WRR office buildings and numerous tanks.

In December, 1982, the WRR site was listed on the National Priorities List (NPL). On July 10, 1986, approximately 100 Potentially Responsible Parties (PRPs) entered into an Administrative Order by Consent with U.S. EPA to conduct a removal action at the site. Because the removal was not satisfactorily completed, a Unilateral Administrative Order was issued to a smaller group of PRPs on February 17, 1988, requiring them to complete a removal action.

On August 14, 1987, U.S. EPA entered into an Administrative Order by Consent with over 100 PRPs to conduct the RI/FS. The U.S. EPA and IDEM oversaw all facets of the investigations. The RI was conducted to determine the nature and extent of contamination and the FS evaluated the alternatives to prevent migration of the contaminants. Results of the RI, which was finalized in June, 1989, are as follows:

- o Surface soils in the area of the shooting range (SB-18) are contaminated with polynuclear aromatic hydrocarbons (PAHs).

# LEGEND

- GROUNDWATER
- SOILS - VOC's
- ▨ SOILS - PAH's
- ▩ SOILS - METALS
- MW2s + MONITORING WELL LOCATION & NUMBER

## NOTES:

1. REFER TO REMEDIAL INVESTIGATION REPORT FOR SPECIFIC LEVELS AND TYPES OF CONTAMINANTS LOCATED.

-4-

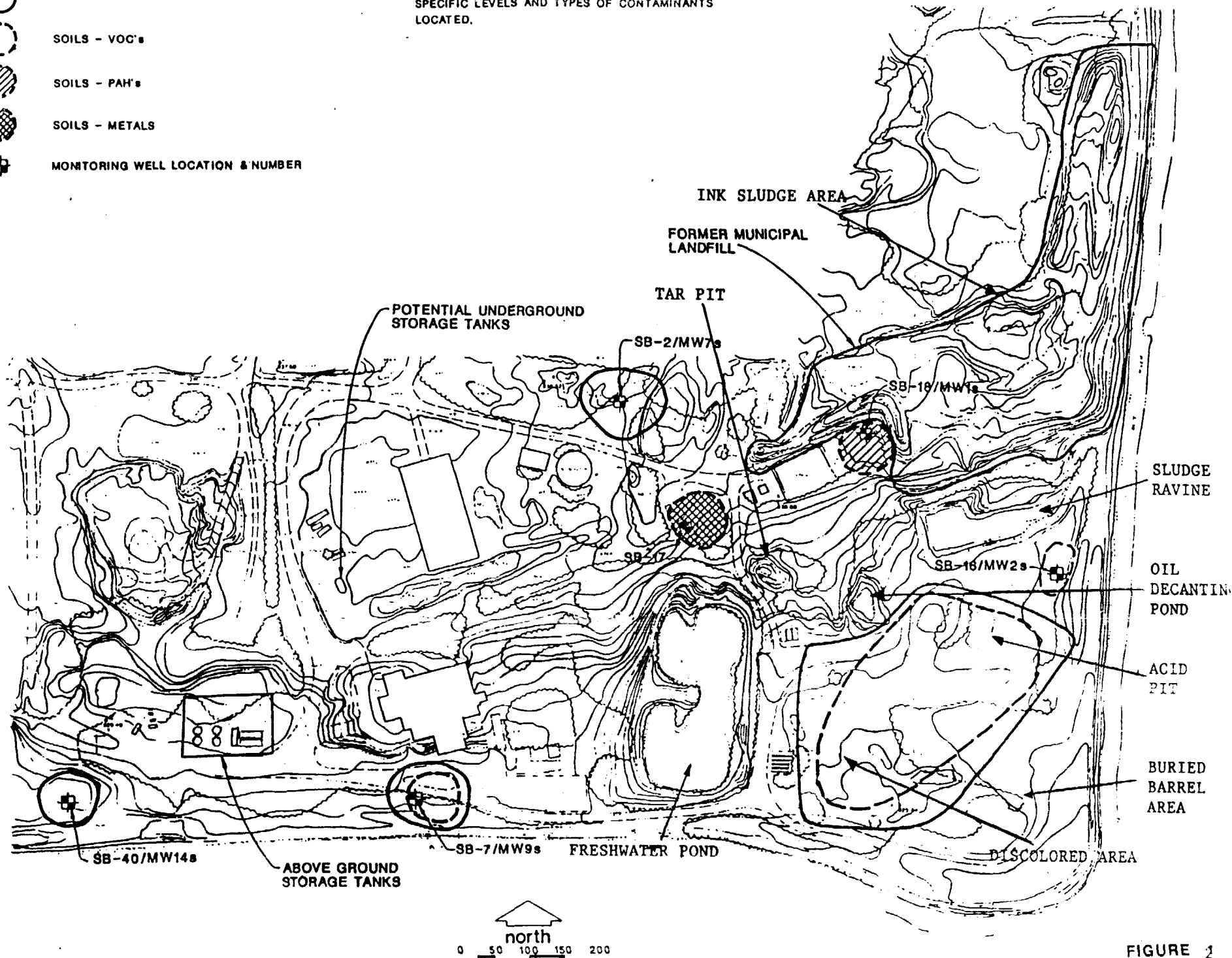


FIGURE 2

- o The highest levels of volatile organic soil contamination were detected in the southwest area of the site along the Blue River (SB-7/MW9 and SB-40/MW14S); in the northern portion of the site west of the old City Landfill; and the southeast corner of the site. The major contaminants are chlorinated ethenes and to a lesser extent, chlorinated ethanes, toluene and alkanes.
- o The majority of groundwater contamination is caused by chlorinated ethanes and occurs in the same general location as the volatile organic soil contamination.
- o Magnesium, cadmium, copper, zinc, and lead were detected at levels above the ranges considered to be common in "natural soils." In general, the elevated levels of these compounds coincided with the areas described above for the volatile organic compounds. However, one apparently isolated area of considerably high concentrations of these elements (particularly lead) was detected approximately midway between the "freshwater pond" and the northern boundary of the site (SB-17/SB-17A). In addition, investigations in 1987, by the Technical Assistance Team (TAT) and the Environmental Response Team (ERT) found elevated levels of lead in the contents of four vertical and three horizontal tanks, located just west of the WRR office, and in the surrounding soils.
- o Concentrations of inorganic parameters in surface water and sediments from the Blue River adjacent to the site were not significantly above those upstream from the site boundary, with the possible exception of copper and zinc in sediments. A slight increase in cyanide concentrations was observed adjacent to the site as compared to upstream concentrations. Concentrations of inorganic parameters (particularly cyanide) in on-site surface waters were elevated in the wetland north of the site, "sludge ravine", and "oil decanting pit." Volatile organic compounds in on-site sediments were elevated in the three surface water locations previously mentioned, as well as in the "freshwater pond."
- o Although this was not discussed in the RI, the old City Landfill lacks appropriate cover to ensure compliance with RCRA Subtitle D regulations.

#### Scope and Role of the Response Action

The PRPs, under the direction of the U.S. EPA have already initiated two removal response actions at this site. Removal activities under the 1986 Administrative Order by Consent included excavation and disposal of contaminated soil in the "oil decanting pit", "tar pit" and "sludge ravine"; removal and disposal of the contents of 215 55-gallon drums and soil from the



"buried barrel area" and backfill. Backfilling remains to be done in the "oil decanting pit", "tar pit" and "sludge ravine". Removal activities under the 1988 Unilateral Administrative Order included excavation and disposal of contaminated soil from the "discolored area", "acid pit", "ink sludge area" and "sludge ravine"; removal and disposal of an additional 125 drums; removal and disposal of the contents of 23 horizontal tanks; fencing of the "oil decanting pit", "sludge ravine", and "discolored area"; and backfilling the "acid pit" and "ink sludge area" with off-site borrow.

This Proposed Plan addresses contaminated soil and groundwater in the lower floodplain and upland areas of the site; RCRA Subtitle D closure requirements for the old Columbia City landfill; and empty/clean/removal of the remaining tanks and debris which pose a threat to human health and the environment. These areas were determined to be a principal threat at the site because of the potential threat of direct contact with the soils and the soil's impact on the groundwater. The contaminated groundwater is a principal threat at the site because of the potential for direct ingestion of contaminants through municipal and private drinking water wells. This is the third and final response action for this site.

#### Summary of Site Risks

During the RI, an analysis was conducted to estimate the health or environmental problems that could result if the contamination at the WRR site was not cleaned up. This analysis is commonly referred to as a baseline Endangerment Assessment (Chapter 6 of the RI Report). In conducting this assessment, the focus was on the health effects that could result from direct exposure to the contaminants as a result of the soil coming into contact with the skin, or from direct ingestion of the soil. The Endangerment Assessment also focused on the health effects that could result from ingestion, inhalation, or direct contact with the skin of contaminated groundwater from a municipal or drinking water well.

#### Groundwater

The major contaminants of concern in the groundwater were Trichloroethylene (TCE) and vinyl chloride. TCE and vinyl chloride are volatile organic compounds that are known to cause cancer in laboratory animals and are therefore classified as carcinogens. TCE is a highly mobile contaminants that typically migrates through the soil into the groundwater.

The average concentrations of TCE and vinyl chloride found in the groundwater beneath the WRR site resulted in an excess lifetime cancer risk of  $2 \times 10^{-4}$ . This means that if no cleanup action is taken by U.S. EPA, two additional people per ten thousand have a chance of contracting cancer as a result of the exposure to

groundwater contaminated with TCE and vinyl chloride.

### Soil

The major contaminants of concern in the soils were polynuclear aromatic hydrocarbons (PAHs), and Polychlorinated biphenyls (PCBs). PAHs and PCBs are also classified as carcinogens. PAHs tend to be relatively immobile contaminants that will typically remain in the soil for long periods of time.

Sampling of the on-site soil found that average concentrations of PAHs resulted in an excess lifetime cancer risk of  $3 \times 10^{-2}$ . This means that if no cleanup action is taken by U.S. EPA, three additional people per one hundred have a chance of contracting cancer as a result of the exposure to the PAH-contaminated soil.

These estimates were developed by taking into account various conservative assumptions about the likelihood of a person being exposed to the soil and groundwater and the toxicity of the contaminants.

Actual or threatened releases of hazardous substances from this site, if not addressed by the preferred alternative or one of the other active measures considered, may present an imminent and substantial endangerment to public health, welfare, or the environment.

### SUMMARY OF ALTERNATIVES

Based on the findings in the RI report, the following remedial action objectives were established for the WRR site to ensure protection of human health and the environment:

#### Groundwater

- o Minimize potential future risk to public health from consumption of contaminated groundwater.
- o Control migration of contaminated groundwater to the Blue River water and sediment.
- o Reduce migration of subsurface soil contaminants to the groundwater

#### Contaminated Soil

- o Minimize risk to public health and environment from the direct contact with PCB and PAH contaminated surface soil.
- o Reduce potential for erosion and transport of contaminated surface and subsurface soil to the Blue River.

### Municipal Landfill

- o Ensure adequate cover is present to prevent erosion and exposure of waste resulting in direct contact or washout to the river.

### Surface and Subsurface Tanks and Contents

- o Eliminate potential migration of tank contents to surface and subsurface soil and groundwater.

### Common Elements

There are seven remedial action alternatives which have been developed to address the contamination at the WRR site. Except for the "No Action" alternative, all of the alternatives now being considered for the site would include a number of common components. Alternatives 2 through 7 include removal and/or treatment of the tank contents and capping of the municipal landfill in accordance with RCRA Subtitle D sanitary landfill closure requirements. Soil and groundwater in the vicinity of the tanks may require additional investigation to delineate the extent of contamination due to spills or leaks associated with the tanks. It is assumed that additional soil or groundwater contamination could be addressed in a similar manner used in other areas of the site.

A large amount of debris is scattered throughout the site. These materials should be evaluated and those determined to be solid waste can be consolidated and placed under the municipal landfill cap. Those materials determined to be contaminated with hazardous waste would need to be cleaned or disposed in accordance with RCRA.

Each alternative also includes groundwater extraction and treatment to health-based levels and MCLs. Long-term groundwater monitoring in compliance with requirements of RCRA Subpart F, 40 CFR Section 264.100 will be conducted to gauge the effectiveness of the selected remedy. In addition, erosion control provisions and deed restrictions are required. It should also be noted that the wastes at the WRR site were found to be sufficiently similar to RCRA-listed waste or RCRA-characteristic wastes to make RCRA relevant and appropriate.

Lead-contaminated soil was found in the vicinity of SB-17 and SB-17A. Although this contamination appears to be localized, the extent of remediation of this area will be determined based on additional sampling during the remedial design. Remediation of the lead-contaminated soil will be achieved by either soil washing or immobilization technologies.

A more detailed discussion of the remedial action alternatives is presented below. Costs, including annual operation and maintenance (O&M), for each alternative are also provided. All costs and implementation times are estimated.

**Alternative 1: NO ACTION**

Capital Cost: \$0  
Annual O&M Cost: \$0  
Present Worth: \$0  
Time to Implement: None

The Superfund program requires that the "no action" alternative be evaluated at every site to establish a baseline for comparison. Under this alternative, U.S. EPA would taken no further action at the site to prevent exposure to the soil and groundwater contamination.

**Alternative 2: GROUNDWATER EXTRACTION AND AIR STRIPPING/  
COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/  
EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING  
MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND  
UNDERGROUND TANKS**

Capital Cost: \$3,329,630  
Annual O&M Cost: \$ 228,500  
Present Worth: \$5,483,700  
Time to Implement: 30 years

Given the presence of the municipal well field immediately north of the site, vertical hydraulic gradients are downward from the upper to lower aquifers when the municipal well is being used. Therefore, the groundwater extraction system would be designed to lower the water table approximately 3.5 feet so that groundwater gradients are upward even when the municipal wells are pumping. The extraction wells in the southeast area of the site would be located within a slurry wall in order to allow for lower extraction rates and to facilitate lowering of the groundwater table. Additional groundwater extraction wells would also be placed through the site in order to intercept all contaminated groundwater. Treated groundwater would be discharged to the Blue River. Discharge limits would be established in accordance with IDEM's NPDES program.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. VOC-contaminated soil will be capped in accordance with RCRA Subtitle C closure requirements to prevent the incidence of dermal contact and reduce contaminant migration to the groundwater via infiltration.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

**Alternative 3: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL FLUSHING WITH TREATED GROUNDWATER/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS**

Capital Cost: \$3,248,230  
Annual O&M Cost: \$ 236,700  
Present Worth: \$5,110,848  
Time to Implement: 15 years

The groundwater extraction and treatment system would be identical to the system described for Alternative 2. However, to reduce the time that the system will need to operate, the treated effluent will be flushed through the areas of the site with VOC-contaminated soils. A treatability study will be required to determine the process effectiveness and necessity for adding surfactants to the flushing fluid for aid in contaminant removal. Contaminants are recovered by the groundwater extraction system and treated. The soil flushing has the effect of accelerating the natural process of soil flushing that would occur through rainfall infiltration. It is estimated that the flushing system would operate for a period of 15 years.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

**Alternative 4: GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS**

Capital Cost: \$3,306,875  
Annual O&M Cost: \$ 291,000  
Present Worth: \$5,582,499  
Time to Implement: 15 years

To reduce the time required to operate the groundwater extraction and treatment system presented in Alternative 2, a soil vapor extraction (SVE) system would be used to remove the VOC contamination from the soil. The vapor extraction wells would be placed in the areas of the site with VOC-contaminated soils. The area surrounding the vapor extraction wells would be covered with approximately three feet of fill to increase the efficiency of the system by reducing the volume of air being pulled from above the ground surface. The air emissions will be treated to health-based levels. The SVE and groundwater extraction systems will operate in conjunction for approximately 15 years to meet the clean-up criteria.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

**Alternative 5: GROUNDWATER EXTRACTION AND AIR STRIPPING/  
EXCAVATION AND BIOLOGICAL TREATMENT OF VOC-CONTAMINATED SOIL/  
COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED  
RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE  
CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS**

Capital Cost: \$7,988,170  
Annual O&M Cost: \$ 279,000  
Present Worth: \$9,927,114  
Time to Implement: 15 years

To reduce the operating time for the groundwater extraction and treatment system presented in Alternative 2, approximately 30,000 cubic yards of VOC-contaminated soils would be excavated and biologically treated on-site. Microorganisms, nutrients, and oxygen would be supplied to the contaminated soils to promote transformation and aerobic biological degradation of the VOC contaminants. The area available to construct the treatment facility is not large enough to accommodate all of the contaminated soil at one time. Therefore, the excavation, treatment and backfilling operations would need to be staged. It is estimated that soil treatment would take two to four years.

Since this alternative involves the excavation and placement of waste, the RCRA Land Disposal Restrictions (LDR) would be invoked. Therefore, the cost estimate assumes a minimum technology disposal unit would be constructed prior to redisposal of the excavated and treated soil.

The PAH-contaminated soil will be covered to prevent the incidence of dermal contact. In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

**Alternative 6: GROUNDWATER EXTRACTION AND AIR STRIPPING/  
EXCAVATION AND ON-SITE INCINERATION OF VOC- AND PAH-  
CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/  
MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF  
ABOVEGROUND AND UNDERGROUND TANKS**

Capital Cost: \$ 9,805,845  
Annual O&M Cost: \$ 228,500  
Present Worth: \$11,322,222  
Time to Implement: 10 years

To minimize the operating time of the groundwater extraction and treatment system presented in Alternative 2, the VOC- and PAH-

contaminated soils would be excavated and incinerated on-site. Approximately 30,000 cubic yards of contaminated soil would be incinerated on-site using a mobile infrared unit. Based on an average process rate of 14,000 lb/hr, the incineration process would be completed in approximately nine to twelve months. It is estimated that the groundwater extraction system would operate for approximately ten years.

For costing purposes, it is assumed that the incinerator ash would not be a RCRA hazardous waste and could be backfilled on-site. Confirmatory sampling would be required prior to disposal. Waste sludge from the incinerator air scrubbers would, however, be considered hazardous and would thus require disposal at an approved RCRA facility.

In addition, those elements presented in the section entitled "Common Elements" are included in this alternative.

**Alternative 7: GROUNDWATER EXTRACTION AND DISCHARGE TO THE POTW/ COVERING PAH-CONTAMINATED SOILS/ CAPPING VOC-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS**

Capital Cost:	\$3,571,980
Annual O&M Cost:	\$ 298,500
Present Worth:	\$6,385,960
Time to Implement:	30 years

This alternative is the same as Alternative 2, except that the extracted groundwater would be discharged to the POTW instead of air stripping and discharge to the Blue River. Consideration of this alternative would be based on the assumption that the Columbia City POTW is willing and able to accept the WRR site effluent. Currently the POTW does not have a pretreatment program with IDEM. The Columbia City POTW is scheduled for a capacity expansion in October 1990.

**EVALUATION OF ALTERNATIVES**

The preferred alternative for cleaning up the WRR site is Alternative 4 -- GROUNDWATER EXTRACTION AND AIR STRIPPING/ SOIL VAPOR EXTRACTION/ COVERING PAH-CONTAMINATED SOILS/ EROSION CONTROLS/ DEED RESTRICTIONS/ MONITORING/ CAPPING MUNICIPAL LANDFILL/ REMOVE CONTENTS OF ABOVEGROUND AND UNDERGROUND TANKS. In addition, additional investigation will be conducted in the now inactive tank area and the lead-contaminated soil area (at SB-17 and SB-17A) to determine the extent of remediation. Based on current information, this alternative would appear to provide the best balance of trade-offs among the alternatives with respect to U.S. EPA's nine evaluation criteria. This section discusses the performance of the preferred alternative

against the nine criteria, noting how it compares to the other options under consideration. A glossary of the evaluation criteria is contained in Table 1.

### **Analysis**

**Overall Protection.** All of the alternatives, with the exception of the "no action" alternative, would provide adequate protection of human health and the environment by eliminating, reducing, or controlling risk through treatment or engineering controls. The preferred alternative would treat the volatile organic contaminants in the soil and groundwater, cover the PAH-contaminated soil, and cap the municipal landfill to reduce the risks associated with direct contact and ingestion of contaminated soils and/or groundwater.

Because the "no action" alternative is not protective of human health and the environment, it is not considered further in this analysis as an option for this site.

**Compliance with ARARs.** All alternatives would meet their respective applicable or relevant and appropriate requirements of Federal and State environmental laws. Since the preferred alternative would not involve the excavation and placement of waste, LDR would not be an ARAR. However, all options would involve the relevant and appropriate RCRA requirements.

Discharge of the treated groundwater to the Blue River would meet the State's NPDES discharge limits. No waiver from ARARs is necessary to implement any of the active cleanup options. Soil clean-up levels will be established to ensure that contaminant leaching into the groundwater will not exceed health-based levels or MCLs.

**Long-term effectiveness and permanence.** The preferred alternative would reduce the inherent hazards posed by the VOC-contaminated soil and groundwater through treatment. SVE would be an effective method to reduce contaminant levels in soils because the primary contaminants are VOCs. In addition, the soil cover over the PAH- and VOC-contaminated soils would eliminate the direct contact threat associated with these areas. Removal of the tank contents would eliminate the potential for additional contamination of the surrounding soil and groundwater due to leaks or spills from the tanks.

Alternative 3 would also be effective in reducing site risks. However, potential complications with soil flushing are the controls required to lower the water table to induce upward gradients from the lower aquifer, while at the same time flush soils above the water table. In addition, the heterogeneous nature of the soils in the southeast area of the site may cause the drainage gallery to backup and discharge to the surface.



TABLE 1

GLOSSARY OF THE NINE CRITERIA

Community Acceptance	will be assessed in the Record of Decision following a review of the public comments received on the RI/FS report and the Proposed Plan.
Compliance with ARARs	addresses whether or not a remedy will meet all of the applicable or relevant and appropriate requirements of other environmental statutes and/or requires uses of a waiver.
Cost	includes capital and operation and maintenance costs.
Implementability	is the technical and administrative feasibility of a remedy, including the availability of goods and services needed to implement the chosen solution.
Long-term Effectiveness and Permanence	refers to the ability of a remedy to maintain reliable protection of human health and the environment over time once cleanup goals have been met.
Overall Protection of Human Health and the Environment	addresses whether or not a remedy provides adequate protection and describes how risks are eliminated, reduced or controlled through treatment, engineering controls, or institutional controls.
Reduction of Toxicity, Mobility, and Volume	is the anticipated performance of the treatment technologies a remedy may employ.
Short-term Effectiveness	involves the period of time needed to achieve protection and any adverse impacts on human health and the environment that may be posed during the construction and implementation period until cleanup goals are achieved.
State Acceptance	indicates whether, based on its review of the RI/FS, Proposed Plan, and public comments, the State agency concurs, opposes, or has no comment on the preferred alternative.

Alternatives 5 and 6 would effectively reduce site risks through treatment; however, land disposal of the treated material or ash would require long-term O&M.

Alternatives 2 and 7 would eliminate the direct contact threat; however, the inherent hazards of the waste will remain. The municipal landfill cap and groundwater monitoring system will require long-term O&M for all alternatives. Alternatives 5 and 6 are the only alternatives that would actively treat the PAH-contaminated soil, for all other alternatives these soils would be consolidated under the municipal landfill cap.

**Reduction of toxicity, mobility, or volume of the contaminants through treatment.** Only four of the alternatives would treat the principal threat of VOC-contaminated soil to reduce toxicity, mobility, or volume. The preferred alternative and alternative 3 would involve treatment of the VOC-contaminated soil via SVE or soil flushing in conjunction with groundwater extraction and treatment.

Alternatives 5 and 6 would involve biological treatment or incineration that would permanently destroy the VOC and PAH contaminants. The treated soil or contaminated ash would; however, be disposed of in a RCRA landfill.

Alternatives 2 and 7 achieve no reduction in toxicity, mobility, or volume for the VOC-contaminated soils.

It should be noted that although the cap over the municipal landfill and PAH-contaminated soil does not afford a reduction in toxicity, mobility, or volume, it would significantly reduce infiltration and the production of leachate that could migrate off-site.

**Short-term effectiveness.** The preferred alternative and Alternative 3 would require approximately 15 years to achieve the groundwater clean-up levels. Although Alternatives 5 and 6 would achieve groundwater clean-up levels quicker, both of these alternatives require excavation which would pose some short-term risks of exposure to VOCs during the excavation process. In addition, rainfall infiltration will be immediate during the construction period. This could increase the migration of contaminants in the groundwater. Groundwater clean-up levels would not be achieved for 30 years for Alternatives 2 and 7.

**Implementability.** The individual technologies described for each of the alternatives are conventional and well demonstrated. However, there is some concern over the technical feasibility of Alternative 3 given the heterogeneous nature of the soils. Conversely, the preferred alternative, which involves SVE has been found to be feasible for a variety of soil conditions.

No unusual difficulties in the placement of the soil cover and municipal landfill cap are anticipated. However, given the close proximity of the PAH-contaminated soil to the municipal landfill the feasibility of constructing two caps is questionable. It may be more appropriate to just incorporate the PAH-contaminated soil under the municipal landfill cap.

Implementation of Alternative 7 would require the consent of Columbia City for use of its POTW.

**Cost.** The present-worth cost of the preferred alternative is \$5,582,500. The lowest-cost alternative is Alternative 3 at \$5,110,800. The highest-cost alternative is Alternative 6 at \$11,322,200. Alternatives 2, 5 and 7 have present-worth costs of \$5,483,700, \$9,927,100, and \$6,386,000, respectively.

**State acceptance.** The State of Indiana Department of Environmental Management supports the preferred alternative.

**Community acceptance.** Community acceptance of the preferred alternative will be evaluated after the public comment period ends and will be described in the Record of Decision for the site.

#### Summary of the Preferred Alternative

In summary, Alternative 4 would achieve substantial risk reduction through treatment of the principal threat remaining at the site (i.e., the VOC-contaminated soil, groundwater, and tank contents) and by providing safe management of other material that will remain at the site. Given its effectiveness and implementability, Alternative 4 achieves this risk reduction in a comparable or smaller timeframe and cost than the other treatment options. Therefore, the preferred alternative is believed to provide the best balance of trade-offs among alternatives with respect to the evaluation criteria. Based on the information available at this time, U.S. EPA believes the preferred alternative would be protective of human health and the environment, would comply with ARARs, would be cost effective, and would utilize permanent solutions and alternative treatment technologies to the maximum extent practicable. Because it would treat the VOC-contaminated soil and groundwater, the remedy also would meet the statutory preference for the use of a remedy that involves treatment as a principal element.

#### THE COMMUNITY'S ROLE IN THE SELECTION PROCESS

U.S. EPA solicits input from the community on the cleanup methods proposed for each Superfund response action. U.S. EPA has set a public comment period from January 22, 1990 through February 21, 1990 to encourage public participation in the selection process. The comment period includes a public meeting at which U.S. EPA

and IDEM will present the FS report and the Proposed Plan, answer questions, and receive both oral and written comments.

The public meeting is scheduled for Wednesday, February 7, 1990 at 7:00 p.m. and will be held at:

Council Room, City Hall  
112 South Chauncey  
Columbia City, Indiana

Comments will be summarized and responses provided in the Responsiveness Summary section of the Record of Decision (ROD). The ROD is the document that presents U.S. EPA's final selection for cleanup. The public can send written comments to or obtain further information from:

Tinka G. Hyde  
Remedial Project Manager  
U.S. EPA - 5HS-11  
230 South Dearborn Street  
Chicago, Illinois 60604  
(312) 886-9296

Toll free (800) 621-8431  
between 9:00 a.m. and 4:30 p.m. Central Time

U.S. EPA and IDEM are soliciting public comments about the most acceptable way to clean up the Wayne Reclamation and Recycling site. The Proposed Plan and the RI/FS Reports have been placed in the Information Repositories and Administrative Record for the site. The Administrative Record includes all documents such as work plans, data analyses, public comments, transcripts and other relevant material used in developing the remedial alternatives for the Wayne Reclamation and Recycling site. These documents are available for public review and copying at the following locations:

City Hall  
112 South Chauncey  
Columbia City, IN

Peabody Library  
203 North Main  
Columbia City, IN.

P 298 719 495

RECEIPT FOR CERTIFIED MAIL

794

TOM HARGETT  
FRUEHAUF CORP.  
LIQUID AND BULK TANK DIVIS  
P.O. BOX 660  
FORT WAYNE, IN 46801 *1/AB*



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*PH-11-5HS*

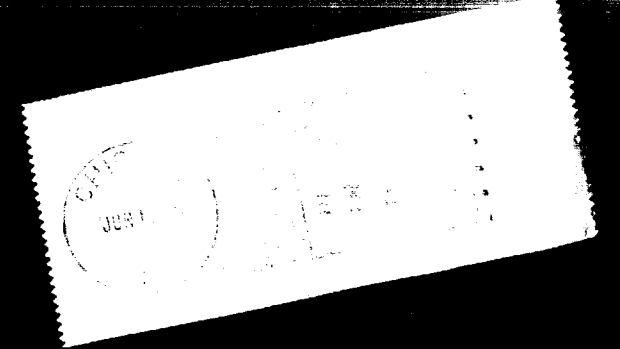
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